



# **SIRVA CODE OF BUSINESS CONDUCT & ETHICS**

## **A COMMITMENT TO INTEGRITY**

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## A MESSAGE FROM SIRVA'S CHIEF EXECUTIVE OFFICER

I am proud of the dedication and integrity of everyone who works at Sirva. You shine through every time we counsel a family through the uncertainty of relocation or deliver moving solutions for our clients and customers. We succeed because our efforts are sincere. Our culture of unyielding integrity and high performance is at the core of everything we do.

For all of us at Sirva, there is no document more important than this Code of Business Conduct & Ethics. It expresses the commitment by each of us to keep our promises to our clients, customers, agents, suppliers, shareholders, and Sirva Personnel, and to keep the company and ourselves operating within the law and to the highest ethical standards.

I ask everyone to read this Code carefully and take it to heart. I expect all of us to:

- Address challenging issues and use Sirva values to find the right answers;
- Support Sirva's commitment to fairness, and inclusion in our workplace;
- Master Sirva's policies: they will help you navigate the laws and ethical standards that apply to our business;
- Communicate openly and candidly; be open to other people's understanding and perspectives;
- Ask questions and raise concerns to Sirva subject matter experts who know how best to handle them; and
- Contact the Sirva Ethics & Compliance Helpline for confidential or anonymous assistance if you have an integrity question or concern.

We are all responsible for upholding the high standards of conduct and ethics set out in this Code. Please speak up if you have any concerns or questions about any activity at Sirva, either by contacting the Sirva Ethics & Compliance Helpline, your manager, the People Team, or the Compliance Team on [Compliance@sirva.com](mailto:Compliance@sirva.com).

When we do these things, we strengthen Sirva.

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Carlyn Taylor  
Chief Executive Officer



# CODE OF BUSINESS CONDUCT AND ETHICS – KEY PRINCIPLES

- We all need to understand and follow Sirva’s Code of Business Conduct & Ethics
- This means acting lawfully, honestly, ethically and in the best interests of Sirva in all that we do
- To do this we must:
  - create a positive, collaborative, safe and supportive work environment
  - treat our fellow employees, clients, customers, suppliers, and business partners with fairness, dignity, and respect
  - not have conflicts of interest where our private interests interfere, or even appear to interfere, with the interests of Sirva
  - not make political donations without approval from the Chief Legal Officer
  - not accept or give any gifts or entertainment other than when in line with Sirva’s Anti-Bribery & Corruption Policy and Travel and Expense Policy
  - keep confidential information confidential and protect individuals’ personal data
  - not discuss Sirva on social media or make public statements about Sirva without approval
  - comply with the law, including anti-bribery laws, sanctions laws, competition laws and export control laws
  - not pay any bribes
  - make sure all third parties we work with are reputable and legitimate
  - be vigilant to prevent paying potentially fake vendors and fake invoices
- Anyone who violates the spirit or letter of the Code or any other Sirva policy may be subject to disciplinary action
- Sirva’s Compliance Team is here to help you navigate the Code and for you to report any suspected violations of the Code, our policies, or the law: contact them on [Compliance@sirva.com](mailto:Compliance@sirva.com) or via Sirva’s Ethics & Compliance Helpline at [www.safecall.co.uk/clients/sirva/](http://www.safecall.co.uk/clients/sirva/)



# 1. INTRODUCTION – A COMMITMENT TO INTEGRITY

Sirva Holdings, LLC and its family of companies (“Sirva”) are a leading worldwide provider of mobility solutions (relocation and moving) to a well-established and diverse customer base around the world. Sirva strives to deliver the best mobility experience at the lowest total cost to relocate through complete management of the global supply chain, the world's leading global operations, industry-leading risk management processes, full accountability, and transparency of costs.

This Code of Business Conduct and Ethics (“Code”) applies to all employees, contractors, directors and officers of the companies comprising Sirva on a worldwide basis. All of these individuals, including temporary employees, are referred to in this Code as “Sirva Personnel” and are expected to act lawfully, honestly, ethically, and in the best interests of the company. The Code also applies to all Sirva’s suppliers.

Sirva Personnel who are unsure whether their conduct or the conduct of others complies with this Code should contact the Sirva Ethics & Compliance Helpline, their manager, the People Team, or the Compliance Team on [Compliance@sirva.com](mailto:Compliance@sirva.com). This Code is subject to change and may be amended, supplemented, or superseded by one or more separate policies.

You should always comply with the laws of the countries where you operate. But in some cases, the laws of the United States may also apply because our parent company is a U.S. corporation, and certain U.S. laws extend to the Sirva’s activities outside of the United States. Other countries may also apply their laws outside of their borders to their own citizens and to Sirva subsidiaries organized under their laws.

If any part of this Code conflicts with local laws or regulations, only the sections of this Code permitted by applicable laws and regulations will apply. Any policies that are specifically applicable to your jurisdiction will take precedence to the extent they conflict with this Code. If you are in doubt, or if there is a conflict between the applicable laws, contact the Compliance Team on [Compliance@sirva.com](mailto:Compliance@sirva.com).

All Sirva policies referenced herein can be found on the Sirva Intranet page(s) and in the hyperlinks where included in this Code.

## 2. YOUR RESPONSIBILITIES – THE SIRVA STANDARD

### A. FOLLOW THE CODE

All Sirva Personnel are expected to act ethically and follow our Code. Our Code, together with our company policies, provide the framework for each Sirva Personnel to perform their jobs ethically and responsibly. If you have questions on how to interpret the Code, seek guidance from the Compliance Team.



## **B. THE SIRVA STANDARD**

### ***Trust***

- People trust Sirva to move them around the world.
- Families trust Sirva to help them find homes and settle into new communities.
- Customers and clients trust Sirva to keep accurate accounts and to safeguard confidential information.
- Agents and service suppliers trust Sirva to coordinate household moves and relocations efficiently.
- Sirva Personnel trust each other with respect.

### ***Living Our Values***

- Conduct yourself with integrity, respect and dignity in all aspects while representing Sirva.
- Make a commitment to fairness and inclusion by providing a productive, creative and engaging environment that fosters interactive dialogue with fellow Sirva Personnel
- Provide equal opportunities and treatment for all Sirva Personnel, regardless of race, religion, gender, sexual orientation, gender identity, disability, ethnicity, nationality, or any other category protected by applicable law.

### ***Acting With Integrity***

- Keep your promises. Build trust.
- Tell the truth. Every statement and document must be accurate.
- Be Honest. Our statements must not be misleading and not intentionally omit critical information.
- Treat everyone with respect. Never put your colleagues at risk.
- Never pretend that a policy does not apply or make excuses for a bad decision. “Everyone does it” is not a reason; it’s a red flag.
- Avoid even the appearance of impropriety. Always protect the company’s reputation and your own.
- Comply with all laws that govern our business and all policies that apply to your job. Beware of questionable industry practices.
- Raise concerns about possible ethical violations. Cooperate in investigations.
- Never retaliate against anyone for raising an ethical concern or helping to resolve one in good faith.

### ***Making Good Decisions***

- No document or policy can answer all potential questions or address all potential issues. When you are unsure about the right course of action, review Sirva values and policies and ask yourself:
  1. Have I gathered all the facts? Have I analyzed them well?
  2. Do I know what our values and policies require in this case?



3. Have I sought advice from people I trust? Have I consulted Sirva subject matter experts?
4. Who are the people or companies affected by my decision? What are my obligations to them?
5. Is my course of action legal?
6. Is this the right thing to do?
7. How would my decision look in the news for the entire world to see?

### ***The Sirva Compliance Team***

The Compliance Team oversees Sirva's program for compliance with law and with this Code. The Compliance Team is led by the Head of Compliance, who reports to the Audit Committee of Sirva's Board of Directors. The Sirva Compliance Team manages the Sirva Ethics & Compliance Helpline. The Compliance Team works in conjunction with the Sirva Information Security Group, DPO, and Privacy Officer, as well as subject matter experts, investigators, and senior managers. In addition to overseeing the compliance matters of the company, a key responsibility of the Compliance Team is to be accessible to each of you: answering questions, addressing issues, and providing training.

You can contact the Compliance Team for a copy of any Sirva policy or ask for assistance regarding an ethics or compliance issue by contacting [Compliance@sirva.com](mailto:Compliance@sirva.com), or via the Sirva Ethics & Compliance Helpline at [www.safecall.co.uk/clients/sirva/](http://www.safecall.co.uk/clients/sirva/), or call one of the telephone numbers at the end of this Code.

### ***Accountability***

Sirva is obligated to enforce this Code and maintain compliance with the law. On an annual basis, Sirva requires Sirva Personnel to participate in training on the Code as well as acknowledge the Code and their "Personal Commitment to Integrity" by each Sirva Personnel confirming that:

- I acknowledge that I have received and reviewed the Sirva Code of Business Conduct & Ethics
- I acknowledge that I understand and will comply with the policies and principles set out in the Sirva Code of Business Conduct & Ethics
- I acknowledge that when I have a concern about a possible violation of the Sirva Code of Business Conduct & Ethics or any Sirva policy, I will speak up, either to the Sirva Ethics & Compliance Helpline, my manager, the People Team, or the Compliance Team on [Compliance@sirva.com](mailto:Compliance@sirva.com)
- I understand that Sirva prohibits retaliation against anyone for raising in good faith an integrity concern or assisting in an investigation
- I acknowledge that if I had any concern, or received any concern from another person, about a possible violation of the Sirva Code of Business Conduct & Ethics or any Sirva policy in the last 12 months, I reported the concern to the Sirva Ethics & Compliance Helpline, my manager, the People Team, or the Compliance Team on [Compliance@sirva.com](mailto:Compliance@sirva.com)

Violation of any Sirva Policy or this Code can mean a violation of the law. Sirva – or you as an individual – may face criminal penalties (prison or fines) or civil sanctions (damage awards or fines). Any Sirva Personnel who violates the spirit or letter of the Code or any other Sirva policy is, therefore, subject to



disciplinary action, up to and including termination of employment. Examples of conduct that may result in discipline include, but are not limited to:

- Violating the law, a Sirva policy, or this Code or requesting others to do so.
- Failing to promptly report a suspected policy violation.
- Failing to cooperate in an investigation of a policy violation.
- Retaliating against another Sirva Personnel for reporting a concern or cooperating in an investigation.

### ***Speaking Up***

If you are aware of or suspect violations of the Code, our policies, or the law, you must report it so it can be addressed. This includes violations or suspected violations by Sirva suppliers, such as independent household goods moving companies, real estate brokers, title insurance agents, appraisers, and other relocation and moving suppliers and procurement vendors. You may report violations to the Sirva Ethics & Compliance Helpline (anonymously if you so choose), your manager, the People Team, or the Compliance Team on [Compliance@sirva.com](mailto:Compliance@sirva.com). All complaints will be investigated and treated with the necessary and appropriate discretion. No one who reports a suspected Code violation in good faith will be subject to retaliation for making such a report.

Refer to Schedule A of this Code for more information about making a compliance complaint.

### ***Managers' Responsibilities***

Sirva's managers must maintain a culture of unyielding integrity. They must set the right example through their own behavior, speak directly to Sirva Personnel about Sirva values and policies, and evaluate their team's commitment to the Code. If a manager (or anyone) receives a report of a possible violation of Sirva policies or this Code, the manager must report it to the Sirva Ethics & Compliance Helpline, their manager, the People Team, or the Compliance Team on [Compliance@sirva.com](mailto:Compliance@sirva.com).

It is against Sirva policy for any Sirva Personnel to retaliate against any person who in good faith (a) reports what he or she believes is a violation of our Code, our policies or the law; (b) assists other Sirva Personnel to report a violation of this Code, (c) participates in any investigation pursuant to this Code, or (d) raises a compliance question or seeks advice about a particular business practice, decision or action. If you know or suspect that retaliation has occurred or is occurring, you have a duty to report it. Refer to Sirva's *Ethics & Compliance Reporting Policy*.

## **3. RESPECT IN THE WORKPLACE**

All Sirva Personnel are responsible for creating a positive, collaborative, supportive work environment that values integrity and promotes open and honest communication. We believe in developing and maintaining fair and mutually beneficial relationships with our business partners and are committed to treating all our employees, suppliers, and business partners with fairness, dignity, and respect. For more information, please refer to Sirva's *Fair Employment Practices Policy*.



## **A. FAIRNESS, ANTI-DISCRIMINATION, AND ANTI-HARASSMENT**

Sirva supports fairness in our workplace and among our clients and suppliers. Discrimination, harassment or any mistreatment by or of employees, guests, customers or clients, in the workplace or in a work-related situation on the basis of race, color, religion, gender, national origin, age, medical condition or disability, sexual orientation, veteran status, or any other protected group is strictly prohibited. Refer to Sirva's *Fair Employment Practices Policy*. If you suspect harassment, discrimination, or retaliation has occurred, you are encouraged, and managers are required to promptly report it to the Sirva Ethics & Compliance Helpline, your manager, the People Team, or the Compliance Team on [Compliance@sirva.com](mailto:Compliance@sirva.com) (in accordance with Sirva's *Ethics & Compliance Reporting Policy*).

## **B. HEALTH AND SAFETY**

Sirva strives to provide its employees with a clean, safe, and healthy place to work. Employees must comply with all occupational, health and safety laws and internal procedures; not engage in illegal or dangerous behavior, including any acts or threats of violence; not possess, distribute or be under the influence of illicit drugs while on Sirva's premises or when conducting company business; and not possess or use weapons or firearms or any type of combustible material at Sirva facilities, or at Sirva-sponsored functions. If you suspect or are aware of any health and safety violations, report it to the Sirva Ethics & Compliance Helpline, your manager, the People Team, or the Compliance Team on [Compliance@sirva.com](mailto:Compliance@sirva.com). See Sirva's Environmental, Health and Safety Policies, and workplace policies as set forth in the Employee Handbook.

# **4. ETHICS IN OUR BUSINESS ACTIVITIES**

## **A. CONFLICTS OF INTEREST**

Sirva Personnel are expected to use their judgment to act in the best interests of Sirva while performing their work duties. Sirva Personnel should attempt to avoid actual or apparent conflict of interest. A "conflict of interest" occurs when a person's private interest interferes, or even appears to interfere, with the interests of the company. A conflict of interest may arise, for example, from your personal relationship with a customer, client, supplier, vendor, competitor, business partner, or other Sirva Personnel, if that relationship impairs or may be perceived to impair your objective business judgment. A conflict may also arise if you are retaining, managing, or approving payment to a supplier with whom you have a personal relationship outside of your business relationship such as a family member. Other potential conflicts of interest include serving on boards, using company property, information, or resources for personal benefit, having outside employment, or engaging in activities that compete with, or appear to compete with, Sirva's interests. If at any time during your employment, you think you may have a potential or actual conflict of interest, you have an obligation to disclose the conflict to the Sirva Compliance Team. Having a conflict of interest may not necessarily result in a Code violation, but the failure to disclose the issue is a violation of the Code. See the Sirva *Conflicts of Interest Policy*.

## **B. INSIDER TRADING**

Sirva Personnel shall not trade, or tip anyone else to trade, securities of any company on inside information. Inside information is non-public information that would influence an investor's decision to buy, sell or hold a company's stock or other securities. Report all actual or suspected disclosures



(even if the disclosure was accidental) to the Sirva Compliance Team or the Sirva Ethics & Compliance Helpline.

### **C. POLITICAL ACTIVITIES**

Sirva Personnel must comply with all applicable lobbying and campaign finance laws (which can vary across jurisdictions). All political donations, no matter how small, made on behalf of the company (directly or indirectly) must be approved in advance by the Chief Legal Officer. Political donations made by individuals on their own behalf should comply with local laws and regulations. Refer to Sirva's *Political Donations and Lobbying Policy*.

### **D. GIFTS AND BRIBERY**

Giving or receiving gifts or entertainment to or from a current or future client, customer or business partner can potentially create a conflict of interest, especially if the value of the items is significant. Gifts are generally acceptable if the gift or entertainment is modest in value, appropriate to the business relationship, and does not create an appearance of impropriety. Generally, gifts should not be cash or a cash equivalent and should not be given to or received from public officials. Refer to Sirva's *Anti-Bribery and Corruption Policy* and *Travel and Expense Policy*.

## **5. PROTECTION AND USE OF SIRVA'S ASSETS**

### **A. USE OF SIRVA'S RESOURCES AND ASSETS**

Sirva provides Sirva Personnel with a wide range of valuable assets to help you perform your work on behalf of Sirva. These assets include but are not limited to computers, software, fax machines, copiers, telephones, mobile devices, office and electronic equipment, and facilities. Sirva Personnel are expected to treat these assets with care and use them only for Sirva business. Sirva Personnel are not permitted to email business information to their personal email accounts or maintain a copy of business information on their personal computers or other non-work electronic devices. Use of assets for purposes that are disruptive, offensive, embarrassing, or in violation of Sirva's policies, including Sirva's *Information Security Policies* or Sirva's *Acceptable Use Policy*, is strictly prohibited. Sirva reserves the right to monitor or make records of all use of its systems to verify compliance with Sirva policies. Sirva may have obligations to preserve electronic communications and other information in connection with actual or anticipated legal events, such as litigation, arbitration proceedings, governmental investigations, and subpoenas. Upon direction from the Legal & Compliance Team (known as a Legal Hold), you must not destroy, delete, or modify electronic communications or information subject to a Legal Hold.

### **B. INTELLECTUAL PROPERTY RIGHTS**

While employed at Sirva, you may be involved in the creation, development or invention of intellectual property such as concepts, methods, processes, inventions, confidential information and trade secrets, works of authorship, trademarks, service marks and designs. All such intellectual property and the rights therein, such as copyrights and patents, will be owned by Sirva and your moral rights to such intellectual property will be waived. You are responsible for cooperating with Sirva and providing all necessary assistance to ensure that all intellectual property and related rights become the exclusive



property of the company. For further information, you should refer to the terms of your employment offer letter or contract (where applicable) and Sirva's *Intellectual Property Policy*.

## **6. ACCURACY OF BOOKS AND RECORDS AND PUBLIC DISCLOSURES**

### **A. ACCURATE BOOKS AND RECORDS**

All Sirva books, records, and accounts shall be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. The financial statements of Sirva shall conform to generally accepted accounting rules and Sirva's accounting policies. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in Sirva's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation. Sirva Personnel must not conceal information from auditors (both external and internal) and shall always honestly and accurately report all business transactions.

### **B. PUBLIC DISCLOSURES**

Sirva is committed to the transparency and integrity of our information, especially to the extent it forms a part of the public disclosures required of our parent organizations. All Sirva Personnel who are responsible for preparing information as part of that process must ensure that such disclosures are full, fair, accurate, timely, and understandable.

### **C. CONTROLLERSHIP**

We protect company assets and keep accurate records. We escalate problems quickly to solve them before they grow. We make wise business decisions and respect internal checks and balances.

## **7. CONFIDENTIAL INFORMATION AND PROTECTION OF PERSONAL DATA**

### **A. CONFIDENTIAL INFORMATION**

Sirva Personnel are required to use confidential information of Sirva for business purposes only and must always keep such confidential information in strict confidence. This obligation also extends to confidential information of third parties that we have received in the course of our business. Confidential information includes, without limitation, proprietary data, trade secrets, customer and client lists, employee data (other than your own), financial data, tax matters, business plans, contract provisions, marketing, intellectual property, client information, and customer and client information.

Your obligation to maintain the confidentiality of this information means that you may not share any such information outside of Sirva unless Sirva has appropriate non-disclosure agreements (NDA) in place. Contact the Sirva Legal & Compliance Team should you need an NDA, or if you have questions about whether certain information can be disclosed. Sirva Personnel should also refrain from sharing



confidential information internally beyond those persons who legitimately need to know it for the purposes of their job. You should avoid discussing confidential information in public places and should be careful not to leave confidential information unattended in conference rooms or public places. Your obligation to protect confidential information continues after you leave Sirva. If you become aware of confidential information about Sirva or another entity that you know or suspect has been inadvertently disclosed, please contact the Sirva Compliance Team. See the Sirva *Controllership Policy*.

## **B. PROTECTION OF PERSONAL DATA**

Sirva collects the personal data of individuals both inside and outside the organization. Personal data may include, among other things, sensitive personal, medical, and financial information. Sirva Personnel shall be responsible for processing (handling) personal data in accordance with applicable data protection laws, such as the EU General Data Protection Regulation (GDPR). All Sirva Personnel are expected to take all reasonable steps to ensure that personal data is accessed only by those Sirva Personnel who have a need to know the information in order to carry out their duties. Additionally, personal data will only be held by Sirva for as long as it is necessary to satisfy a legitimate business purpose or to satisfy a legal or regulatory obligation to retain such personal data. These principles apply to personal data that we hold for customers, employees, and contractors alike. For more information about Sirva's data processing practices and its compliance with data protection laws, refer to the applicable Sirva data privacy policies. Further guidance on how Sirva Personnel must handle personal data is found in the *Personal Information Privacy* document. See also Sirva's Privacy Policy for customers *Sirva Privacy Policy (Customers)* and Sirva's *Employee Data Privacy Policy*.

# **8. COMMUNICATIONS**

## **A. SOCIAL MEDIA**

Sirva Personnel are strictly prohibited from commenting, posting about, or otherwise discussing Sirva, its customers and clients, and its securities, investments, and other business matters on social networks, chat rooms, wikis, virtual worlds, and blogs (collectively, "social media"). Refer to Sirva's *Acceptable Use Policy and Controllership Policy*.

## **B. OTHER EXTERNAL COMMUNICATIONS**

You may not make public statements on Sirva's behalf unless you have been authorized by the Legal & Compliance Team and/or the Marketing Department. If a member of the media or other third-party contacts you to request information, even if the request is informal, do not respond to it unless you are authorized to do so. In this event, refer the request to your manager or forward the request to the Marketing Department.

# **9. COMPLIANCE WITH LAWS**



## A. COMPLIANCE WITH LAWS

If you have questions about the applicability or interpretation of certain laws, rules, regulations, or policies relevant to your duties at Sirva, you should consult with the Compliance Team. In the event a local law, custom, or practice conflicts with the Code, you must adhere to whichever is most stringent. We expect you to make every reasonable effort to become familiar with the laws, rules, regulations, and policies affecting your activities and to comply with them. Ignorance of the law is not, in general, a defense to breaking the law. If you have any doubts as to the applicability or interpretation of any of the above, you should obtain advice from the Compliance Team.

## B. ANTI-BRIBERY AND CORRUPTION

Sirva Personnel must comply with all anti-corruption laws of the countries in which we do business, including the U.S. Foreign Corrupt Practices Act (FCPA), and the UK Bribery Act, 2010, both of which apply globally. We do not pay bribes in furtherance of our business, either directly or indirectly, and you are not permitted to pay bribes on our behalf or authorize others to pay bribes on our behalf. Facilitation payments are also a form of bribe and are not permitted. Refer to Sirva's *Anti-Bribery and Corruption Policy*.

## C. ANTI-MONEY LAUNDERING

Sirva complies with all laws that prohibit money laundering or financing for illegal or illegitimate purposes. "Money laundering" is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate. You should always ensure you are conducting business with reputable parties, for legitimate business purposes, and with legitimate funds. Be wary of money laundering centers like Russia, Mexico, Turkey, Panama, Thailand, Brazil, Indonesia, Columbia, the Cayman Islands, and the Dominican Republic. If you suspect money laundering activities, report it to the Compliance Team or the Sirva Ethics & Compliance Helpline. See Sirva's *Anti-Money Laundering Policy*.

## D. TRADE CONTROLS

Compliance with customs, visa, licensing, and trade control laws is a service our customers and clients expect. A country's trade controls enforce national security and tax policies.

- Follow all regulations relating to licensing, shipping, import and export, visas, and work permits. This includes filing reports and keeping records.
- Remember that regulations cover goods, technology, software and financial transactions.
- Recognize that U.S. trade controls might apply outside of the United States.
- Screen all transactions against laws that restrict dealings with particular countries and people (i.e., Sanctions). The Compliance Team can assist.
- Do not cooperate with any boycott or trade restriction that violates U.S. law or local law. Report all requests relating to boycotts to the Compliance Team. This includes requests for information about countries or people we do business with.
- See Sirva policy on *International Trade Controls*.



## **E. COMPETITION**

Sirva is committed to competing in a fair and vigorous manner, in compliance with all applicable antitrust and competition laws. Antitrust laws protect consumers by prohibiting anticompetitive conduct that can restrict free competition. In accordance with these laws and regulations, Sirva Personnel must never agree, either directly or indirectly, with competitors: (1) to set prices or other terms related to our products; (2) to allocate customers, advertisers, territories, or product markets; or (3) not to deal with a particular company (called a “group boycott”). If you have questions around competition, please contact the Compliance Team. See the Sirva policy on *Complying With Competition Laws*.

## **F. OFAC COMPLIANCE & GLOBAL SANCTIONS COMPLIANCE**

As Sirva has U.S. operations and a U.S. parent company, Sirva and all Sirva Personnel worldwide must comply with the United States Department of the Treasury’s Office of Foreign Assets Control (known as “OFAC”) economic and trade sanctions programs. OFAC sanctions take different forms. Some prohibit all activities and business transactions relating to specific countries or regions. Other sanctions target specific sectors of a country’s economy or specific individuals and entities.

This means there are certain countries and regions where no Sirva entity (U.S. based or otherwise) may provide services and others where our services may be restricted. In addition, services may not be provided to, and certain activities cannot be carried out with, people and entities on OFAC’s Specially Designated Nationals (“SDN”) list.

Many other countries and organizations (such as the UN) throughout the world also have their own sanctions programs in place, for example the EU and the UK. They may target similar countries, entities and individuals covered by the OFAC sanctions programs.

No Sirva Personnel may provide or offer to provide, arrange, or facilitate any services that violate OFAC restrictions or sanctions put in place by any non-U.S. countries. Any violation can result in severe civil and criminal penalties for both the Sirva Personnel involved and the overall Sirva organization. See Sirva’s *Office of Foreign Asset Control (OFAC) Policy* for details of which countries, entities and individuals are impacted by the OFAC sanctions. Please contact the Compliance team on [Compliance@sirva.com](mailto:Compliance@sirva.com) if you encounter any country, entity or individual that falls within the scope of the OFAC sanctions for further guidance before you continue with your work.

## **G. FRAUD - FAKE VENDORS / INVOICES**

Fake vendor fraud can come in different forms. Sometimes criminals pose as legitimate suppliers and send invoices in for work they haven’t carried out or for goods they haven’t provided. They may send duplicate invoices or invoices that overstate the cost of the services or goods actually provided. Criminals could also intercept and alter legitimate invoices from genuine suppliers to siphon off payments e.g. by changing bank account details. Or they may impersonate property owners or those acting on their behalf to sell, mortgage or defraud buyers in real estate transactions.

Key red flags of fake vendor fraud are when a vendor pressures us to make urgent payments, where we aren’t able to justify and back up what is being invoiced for, where a vendor unexpectedly changes payment details (especially by email) or submits invoices that differ from those issued by the genuine vendor e.g. with a different look, content and feel.



We should only pay vendors who are approved in our systems, and when we have confirmed that the services / goods they have invoiced for have been received and in the amount stated in the invoice. If there is any proposed change to a vendor’s payment details, these need to be verified from a trusted source at the vendor over the phone. We should also check our approved vendor list for any unexpected vendors and any vendors who have a link with any Sirva Personnel. Only pay invoices that are justified and accurate. If you spot any red flags as part of an invoicing process or do not have back up that justifies an invoice for payment, contact the Compliance team on [Compliance@sirva.com](mailto:Compliance@sirva.com).

## H. REPORTING CONVICTIONS

At Sirva, we expect you to continue to adhere to the principles of openness, honesty and transparency. If at any time while you are associated with Sirva you are convicted of, or plead guilty to, a felony or misdemeanor, you have an obligation to report this information to the Compliance Team, the People Team or your manager, unless local laws supersede this obligation in whole or in part.

## I. COMPLIANCE WITH ALL APPLICABLE LABOR LAWS AND INTERNATIONAL STANDARDS<sup>1</sup>

Sirva is committed to compliance with all laws related to child labor, forced labor, employee working hours, payment of employees (including minimum wage laws and overtime), and the working environment See the *Sirva Fair Employment Practices Policy and the Modern Slavery Statement*.

# 10. ADMINISTERING OUR CODE

### *The Sirva Compliance Team*

Chief Legal Officer	Lauren Aste
Head of Compliance	Anna Cope
Privacy Officer	Emily Wolf
Data Protection Officer & CISO	Mike Garza
Other Compliance Team Members	Lisa Fedorka Courtney Hladish Zoe Mattingly

You may contact the Compliance Team on [Compliance@sirva.com](mailto:Compliance@sirva.com) or via the Sirva Ethics & Compliance Helpline ([www.safecall.co.uk/clients/sirva/](http://www.safecall.co.uk/clients/sirva/)) with questions at any time.

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<sup>1</sup> References

- The United Nations Universal Declaration of Human Rights.
- The Conventions of the International Labour Organisation.
- The United Nations Convention on the Rights of the Child and the UK Modern Slavery Act of 2015



## **A. INVESTIGATING MISCONDUCT**

All reports of suspected violations of the Code or the law will be taken seriously and promptly reviewed. You must cooperate fully with an inquiry or investigation. The individual(s) assigned to investigate the violation will (a) act objectively in determining facts through interviews or a review of documents, (b) contact employees who may have knowledge about the alleged incident(s), and (c) recommend corrective actions and/or disciplinary measures where appropriate. In accordance with applicable law, Sirva strives to protect the confidentiality of the individuals involved, to the extent possible, inform an employee of the accusations reported against him/her at a time when such a disclosure will not jeopardize the investigation and, where appropriate, allow employees to review and correct information reported.

## **B. THIS CODE IS NOT A CONTRACT**

This Code is not a contract. It does not convey any specific employment rights or guarantee employment for any specific period of time. If the Code conflicts with a collective bargaining agreement or Works Council rules governing the wages and/or conditions of employment for unionized employees, the collective bargaining agreement or the Works Council rules will prevail; if a collective bargaining agreement or the Works Council rules is silent with respect to an area addressed in the Code, or if the Code supplements a collective bargaining agreement or Works Council rules, applicable employees are expected to abide by the Code.

## **C. AMENDMENTS TO THE CODE**

This Code is reviewed periodically by our Compliance Team to determine whether revisions may be required due to changes in the law or regulations or changes in our business or the business environment. The Code may also be modified at any time at the discretion of Sirva. The Chief Legal Officer must approve any changes to the Code.

## **D. APPLICATION OF THE CODE**

The application of the Code to any situation is determined by the Chief Legal Officer. The application of the Code for a Director on the board of any Sirva entity must be approved by the CEO.

## **E. ACKNOWLEDGMENT**

Upon joining Sirva, each Sirva Personnel will be provided with a copy of the Code and required to acknowledge that they have read and understand Code and that they agree to abide by its provisions. On an annual basis, each Sirva Personnel will be required to re-certify compliance with the Code and disclose any potential conflict of interest or any other possible exception to compliance with the Code.



## **SCHEDULE A: SIRVA'S ETHICS & COMPLIANCE HELPLINE SAFE CALL**

*The Sirva Ethics & Compliance Helpline is available tollfree 24 hours a day, 7 days a week.*

*You may report violations online at [www.safecall.co.uk/clients/sirva/](http://www.safecall.co.uk/clients/sirva/) or call tollfree:*

<b>COUNTRY</b>	<b>NUMBER</b>
Australia	1 800 312 928
Brazil	0 800 892 1750
Canada	1 877 599 8073
China	4008 833 405
Finland	999 800 7233 2255
Germany	00 800 7233 2255
India	000 800 4401 256

<b>COUNTRY</b>	<b>NUMBER</b>
Netherlands	00 800 7233 2255
New Zealand	00 800 7233 2255
Singapore	800 448 1773
South Africa	0 800 990 243
UAE	8000 441 3376
UK	0800 915 1571
USA	1 866 901 3295

For a list of additional toll-free numbers, please visit: [www.safecall.co.uk/freephone](http://www.safecall.co.uk/freephone)

If you have any questions about the Ethics & Compliance Helpline, please contact the Compliance Team on [Compliance@sirva.com](mailto:Compliance@sirva.com) or Sirva Ethics & Compliance Helpline ([www.safecall.co.uk/clients/sirva/](http://www.safecall.co.uk/clients/sirva/)).



## QUESTIONS & ANSWERS

*For additional guidance on any of these Q&A's, contact the Compliance Team on [Compliance@sirva.com](mailto:Compliance@sirva.com) or via the Sirva Ethics & Compliance Helpline ([www.safecall.co.uk/clients/sirva/](http://www.safecall.co.uk/clients/sirva/)).*

### CONFLICTS OF INTEREST

Q: I own a small business that is unrelated to the relocation business. It doesn't take a lot of my time, because I make most of my phone calls and answer most of my e-mails during my lunch break. Is this okay?

A: You need to disclose your involvement with this business to your manager and also to the People Team and the Compliance Team. You will need to get the prior written consent from the People Team and Compliance Team before you take any other employment or have an interest in any other business while you are employed by Sirva. You may be asked to complete a "Conflict of Interest" questionnaire to assist Sirva to determine whether there is a conflict with your work at Sirva, and if so, if such conflict is allowed. A sample of SIRVA's Conflict of Interest questionnaire is available on the Intranet at [Conflict of Interest Reporting Form](#) or you can ask the Compliance Team for a copy. You may not use Sirva equipment or Sirva time in support of your personal business.

Q: My brother's company could be a good supplier for Sirva. Can I purchase services from him?

A: No. To avoid a conflict of interest, you should not direct business to the company of a relative or friend. You need to disclose any potential or actual conflict of interest to your manager and to the Compliance Team, and exclude yourself from any procurement process and decision making relating to any appointment of your brother's company. All supplier appointments need to be handled on an arms-length and objective basis, on terms that are the most advantageous to Sirva. You must remove yourself from any transactions that affect your brother's company.

### HARASSMENT

Q: My coworker tells jokes that make me uncomfortable. What should I do?

A: First, tell your co-worker that you are uncomfortable and want him or her to stop. If you feel like you cannot talk directly to your co-worker, talk to your manager, another manager, the People Team, the Compliance Team or report via the Sirva Ethics & Compliance Helpline. Sirva does not tolerate harassment or a hostile work environment.

### FACILITATION PAYMENTS

Q: You are having trouble getting an international transferee's shipment cleared through customs. A clerk in the customs office offers to help expedite the process but expects to receive a tip. Should you pay the clerk a tip?

A: Sirva does not allow Sirva Personnel to make facilitating payments to expedite a routine administrative action. Please contact the Compliance Team should you receive a request for any such payment, to discuss next steps.



Q: What if it is customary in the country to provide facilitation payments or kickbacks?

A: No. Even if it is customary in the country, facilitation payments (also known as “grease payments”) are prohibited by Sirva.

## **MONEY LAUNDERING**

Q: A new Sirva customer wants Sirva’s assistance relocating between its offices in the United States and Singapore. It offers to pay via a wire transfer from an account held in the name of a Cayman Islands company at a bank located in Thailand. It also requests that any overpayments be returned to an account in Russia. Should you be suspicious?

A: Yes, you should be suspicious of payment transactions involving transferring money from or to countries or companies that aren’t related to our business dealings or that seem illogical. Because of a potential money laundering concern, you should contact the Compliance Team before proceeding with this arrangement.

## **PROTECTION OF PERSONAL INFORMATION**

Q: A purchasing manager from a potential new customer has given you his business card. Is it OK to add his name and contact details into a database where other Sirva Personnel can access it?

A: Maybe. If you collected this information in a country that has a personal data protection law (like most European countries), you may be prohibited from using or sharing the information if the purchasing manager has not given you express consent to do so. Please contact the Legal & Compliance Team for further guidance.

## **ANTITRUST**

Q: During the morning break at a trade association meeting, your two largest competitors approach you and propose that Sirva join them in implementing a price increase that will improve margins for all of the companies. Is this acceptable?

A: No, we do not make agreements with respect to pricing with competitors. If you are invited to participate in such a scheme, you should strongly object to the invitation, advise the others involved in the scheme that this behavior is illegal and that Sirva will not participate, and then report the incident to the Compliance Team.

## **FRAUD**

Q: I’ve seen an invoice submitted by a third party vendor for payment but I’m not aware of them having done any work on behalf of Sirva or our customers/clients or provided any products. What should I do?

A: If you receive an invoice that does not appear to be justified, do not pay it. You should contact the Compliance Team promptly and provide them with details of the invoice, the vendor, any communications with the vendor and your concerns. The Compliance Team, or another appropriate subject matter expert, will investigate and let you know if you can proceed with payment of the invoice.



## CONFIDENTIAL INFORMATION

Q: Recently, I received a call from a former co-worker asking how things were going at Sirva. Is it okay to forward an internal announcement to him that describes the reorganization of our department and Sirva's strategic direction?

A: No. You may not forward this information to an outside party, even if it's a friend or a former co-worker. We all have a responsibility to safeguard Sirva's confidential information. Organizational structure and strategic plans are considered confidential and not something you may discuss with a third party.

## ANTI-BRIBERY AND CORRUPTION

Q: What is Sirva's policy on anti-corruption?

A: Sirva has a "zero tolerance" policy when it comes to matters of corruption.

Q: Can Sirva or an employee within the organization be prosecuted under the FCPA and other anti-bribery statutes if a bribe is made by a third party, such as one of Sirva's suppliers?

A: Yes, legal liability is not limited to those who actively participate in illegal conduct. A bribe made by a third party is illegal under anti-bribery laws. Sirva and individuals who made the payment to the agent on Sirva's behalf can be prosecuted under the FCPA and other anti-bribery statutes.

## CHARITABLE CONTRIBUTION

Q: A Sirva Client has requested that Sirva make a charitable contribution to a children's charity. Is this permitted?

A: You should never make a charitable contribution at the request of a client, customer, agent, supplier, or government official without prior approval from Sirva's Finance Department and CEO. You should also never solicit a charitable contribution without prior approval from the Chief Legal Officer.

## SPEAKING UP

Q: Do I have an obligation to report actual or suspected violations of this Code?

A: Yes, you do. Sirva Personnel have an obligation to ensure the integrity of Sirva operations within their respective areas of responsibility and are specifically required to report any observed or suspected violations of this Code. You also have an obligation to cooperate fully with all investigations. To report allegations, please provide as much information and detail as possible, including who, what, when, where, why, and how. Ask yourself:

- **WHO** do you think committed the corruption, fraud, or improper act? Who else was implicated? Who else might have been involved?
- **WHAT** happened? Describe the events fully and be as detailed as possible.
- **WHEN** did it happen? Provide dates, times, and frequency.



- **WHERE** did it happen? Include not only the city and country but also, if possible, an actual address, the name of the building, and the office number.
- **HOW** does your allegation relate to Sirva business? Was a Sirva employee involved? Was a Sirva supplier or client involved?